

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR QUALITY**

**Print Xcel dba Discount Labels, Inc.
4115 Profit Court
New Albany, Indiana 47150**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F043-14011-00029	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 10, 2002 Expiration Date: January 10, 2007

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary label printing facility.

Authorized individual:	Allen Conway
Source Address:	4115 Profit Court, New Albany, Indiana 47150
Mailing Address:	P.O. Box 709, New Albany, Indiana 47151-0709
SIC Code:	2759
Source Location Status:	Floyd
County Status:	Nonattainment for ozone Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD or Emission Offset Rules;

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Five (5) wide double web flexographic printing presses, identified as WDW-1, WDW-2, WDW-3, WDW-4, and WDW-6, each with a maximum line speed of seventy-five (75) feet per minute and a printing width of ten (10) inches.
- (b) Fourteen (14) Tripress flexographic printing presses, identified as Tri-1, Tri-2, Tri-3, Tri-4, Tri-5, Tri-7, Tri-8, Tri-10, Tri-11, Tri-12, Tri-13, Tri-14, Tri-15, and Tri-16, each with a maximum line speed of seventy-five (75) feet per minute and a printing width of six (6) inches.
- (c) Three (3) Mid Double Web flexographic printing presses identified as MDW-1, MDW-2, and MDW-3, each with a maximum line speed of seventy-five (75) feet per minute and a printing width of eight (8) inches.
- (d) Four (4) Double Die Tripresses flexographic printing presses, identified as DDTRI-1, DDTRI-2, DDTRI-3, and DDTRI-4, each with a maximum line speed of seventy-five (75) feet per minute and a printing width of eight (8) inches.
- (e) Four (4) Narrow Double Web flexographic printing presses, identified as NDW-2, NDW-3, NDW-4, and NDW-5, each with a maximum line speed of seventy-five (75) feet per minute and a printing width of five (5) inches.
- (f) Fifteen (15) Webtron 450 flexographic printing presses, identified as 450-1, 450-2, 450-3, 450-4, 450-5, 450-6, 450-7, 450-8, 450-9, 450-10, 450-11, 450-12, 450-13, 450-14, and 450-15, each with a maximum line speed of one hundred and fifty (150) feet per minute and a printing width of four (4) inches.
- (g) Twenty-one (21) Webtron 650 flexographic printing presses, identified as 650-1, 650-2, 650-3, 650-4, 650-5, 650-6, 650-7, 650-8, 650-9, 650-10, 650-11, 650-12, 650-13, 650-14, 650-15, 650-16, 650-17, 650-18, 650-19, 650-20, and 650-21, each with a maximum line speed of one hundred and fifty (150) feet per minute and a printing width of six (6) inches.

- (h) Five (5) Single Web flexographic printing presses, identified as SW-1, SW-2, SW-3, SW-4, and SW-5, each with a maximum line speed of seventy-five (75) feet per minute and a printing width of five and a half (5.5) inches.
- (i) One (1) Barricade Banner flexographic printing press, identified as BB-1, with a maximum line speed of one hundred and fifty (150) feet per minute and a printing width of five (5) inches.
- (j) Two (2) Manhasset flexographic printing presses, identified as MAN-2 and MAN-3, each with a maximum line speed of one hundred and fifty (150) feet per minute and a printing width of twelve (12) inches.
- (k) One (1) Manhasset flexographic printing press, identified as MAN-4, with a maximum line speed of one hundred and fifty (150) feet per minute and a printing width of thirteen (13) inches.
- (l) Five (5) non-heatset offset printing presses, identified as Ryobi-1, Ryobi-2, Ryobi-3, Ryobi-4, and Ryobi-5, each with a maximum line speed of one hundred and ten (110) feet per minute and a printing area of ninety-three and a half (93.5) square inches.
- (m) One (1) Wide Single Web flexographic printing press, identified as WSW-1, with a maximum line speed of seventy-five (75) feet per minute and a printing width of twelve (12) inches.
- (n) One (1) DLI flexographic printing press, identified as MAN-5, with a maximum line speed of two hundred (200) feet per minute and a printing width of twelve (12) inches.
- (o) One (1) paint booth, identified as PB-1, equipped with an air atomization spray gun for wood furniture coating, at a maximum capacity of 0.14 wood parts per hour, with dry filters for over spray control.
- (p) One (1) wide double web flexographic printing press, identified as WDW-7, with a maximum line speed of seventy-five (75) feet per minute and a printing width of ten (10) inches.
- (q) Two (2) Tripress flexographic printing presses, identified as Tri-17 and Tri-18, both with a maximum line speed of seventy-five (75) feet per minute and a printing width of six (6) inches.
- (r) One (1) Mid Double Web flexographic printing press, identified as MDW-4, with a maximum line speed of seventy-five (75) feet per minute and a printing width of eight (8) inches.
- (s) One (1) Double Die Tripresses flexographic printing press, identified as DDTRI-5, with a maximum line speed of seventy-five (75) feet per minute and a printing width of eight (8) inches.
- (t) One (1) Narrow Double Web flexographic printing press, identified as NDW-6, with a maximum line speed of seventy-five (75) feet per minute and a printing width of five (5) inches.
- (u) Three (3) Webtron 450 flexographic printing presses, identified as 450-16, 450-17, and 450-18, each with a maximum line speed of one hundred and fifty (150) feet per minute and a printing width of four (4) inches.

- (v) Eight (8) Webtron 650 flexographic printing presses, identified as 650-22, 650-23, 650-24, 650-25, 650-26, 650-27, 650-28, and 650-29, each with a maximum line speed of one hundred and fifty (150) feet per minute and a printing width of six (6) inches.
- (w) Five (5) non-heatset offset printing presses, identified as Ryobi-6, Ryobi-7, Ryobi-8, Ryobi-9, and Ryobi-10, each with a maximum line speed of one hundred and ten (110) feet per minute and a printing area of ninety-three and a half (93.5) square inches.
- (x) Three (3) DLI flexographic printing presses, identified as MAN -6 (with a maximum line speed of four hundred (400) feet per minute and a printing width of sixteen (16) inches), MAN-7 (with a maximum line speed of four hundred (400) feet per minute and a printing width of twenty-two (22) inches) and MAN-8 (with a maximum line speed of one hundred and fifty (150) feet per minute and a printing width of six and a half (6.5) inches).
- (y) Two (2) Xerox Docucolor 40 Digital Color Production Systems with a maximum line speed of forty (40) 82 x 11 pages per minute.
- (z) One (1) seamer with a maximum line speed of two hundred and twenty (220) millimeters per minute and a width of two hundred and fifty (250) millimeters.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;
- (b) Machining where an aqueous cutting coolant continuously floods the machining interface;
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (d) Closed loop heating and cooling systems;
- (e) Infrared cure equipment;
- (f) Solvent recycling systems with batch capacity less than or equal to 100 gallons;
- (g) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume,
- (h) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;
- (i) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (j) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (k) On-site fire and emergency response training approved by the department;
- (l) Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower;
- (m) Exposure chambers ("towers", "columns"), for curing of ultraviolet inks and ultraviolet coatings where heat is the intended discharge; and

- (n) Emission units whose potential uncontrolled emissions meet the exemption levels specified in 326 IAC 2-1.1-3(d)(1):
 - (1) Various cleaning and maintenance materials with individual VOC emissions of less than ten (10) tons per year.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP) Renewal.

A.5 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or,

for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the

shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.

- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit [326 IAC 2-8-4(5)(C)]. The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirement of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.24 Advanced New Source Review Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Section A.2.

- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction work is suspended for a continuous period of one (1) year or more.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.13 Compliance Response Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be

promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

- (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6. This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) Five (5) wide double web flexographic printing presses, identified as WDW-1, WDW-2, WDW-3, WDW-4, and WDW-6, each with a maximum line speed of seventy-five (75) feet per minute and a printing width of ten (10) inches.
- (b) Fourteen (14) Tripress flexographic printing presses, identified as Tri-1, Tri-2, Tri-3, Tri-4, Tri-5, Tri-7, Tri-8, Tri-10, Tri-11, Tri-12, Tri-13, Tri-14, Tri-15, and Tri-16, each with a maximum line speed of seventy-five (75) feet per minute and a printing width of six (6) inches.
- (c) Three (3) Mid Double Web flexographic printing presses identified as MDW-1, MDW-2, and MDW-3, each with a maximum line speed of seventy-five (75) feet per minute and a printing width of eight (8) inches.
- (d) Four (4) Double Die Tripresses flexographic printing presses, identified as DDTRI-1, DDTRI-2, DDTRI-3, and DDTRI-4, each with a maximum line speed of seventy-five (75) feet per minute and a printing width of eight (8) inches.
- (e) Four (4) Narrow Double Web flexographic printing presses, identified as NDW-2, NDW-3, NDW-4, and NDW-5, each with a maximum line speed of seventy-five (75) feet per minute and a printing width of five (5) inches.
- (f) Fifteen (15) Webtron 450 flexographic printing presses, identified as 450-1, 450-2, 450-3, 450-4, 450-5, 450-6, 450-7, 450-8, 450-9, 450-10, 450-11, 450-12, 450-13, 450-14, and 450-15, each with a maximum line speed of one hundred and fifty (150) feet per minute and a printing width of four (4) inches.
- (g) Twenty-one (21) Webtron 650 flexographic printing presses, identified as 650-1, 650-2, 650-3, 650-4, 650-5, 650-6, 650-7, 650-8, 650-9, 650-10, 650-11, 650-12, 650-13, 650-14, 650-15, 650-16, 650-17, 650-18, 650-19, 650-20, and 650-21, each with a maximum line speed of one hundred and fifty (150) feet per minute and a printing width of six (6) inches.
- (h) Five (5) Single Web flexographic printing presses, identified as SW-1, SW-2, SW-3, SW-4, and SW-5, each with a maximum line speed of seventy-five (75) feet per minute and a printing width of five and a half (5.5) inches.
- (i) One (1) Barricade Banner flexographic printing press, identified as BB-1, with a maximum line speed of one hundred and fifty (150) feet per minute and a printing width of five (5) inches.
- (j) Two (2) Manhasset flexographic printing presses, identified as MAN-2 and MAN-3, each with a maximum line speed of one hundred and fifty (150) feet per minute and a printing width of twelve (12) inches.
- (k) One (1) Manhasset flexographic printing press, identified as MAN-4, with a maximum line speed of one hundred and fifty (150) feet per minute and a printing width of thirteen (13) inches.
- (l) Five (5) non-heatset offset printing presses, identified as Ryobi-1, Ryobi-2, Ryobi-3, Ryobi-4, and Ryobi-5, each with a maximum line speed of one hundred and ten (110) feet per minute and a printing area of ninety-three and a half (93.5) square inches.
- (m) One (1) Wide Single Web flexographic printing press, identified as WSW-1, with a maximum line speed of seventy-five (75) feet per minute and a printing width of twelve (12) inches.

SECTION D.1 FACILITY OPERATION CONDITIONS (Continued)

Facility Description [326 IAC 2-8-4(10)]:

- (n) One (1) DLI flexographic printing press, identified as MAN-5, with a maximum line speed of two hundred (200) feet per minute and a printing width of twelve (12) inches.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), no owner or operator of a flexographic printing source shall allow the operation of the facility unless the volatile fraction of ink as it is applied to the substrate in the flexographic printing operation contains twenty-five percent (25%) by volume or less of organic solvent and seventy-five percent (75%) by volume or more of water; or the ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more nonvolatile material; or meets an emission limit of five-tenths (0.5) pounds of volatile organic compound per pound of solids in the ink.

Currently, the volatile fraction of ink as it is applied to the substrate at the source contains twenty-five percent (25%) by volume or less of organic solvent and seventy-five percent (75%) by volume or more of water; or the ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more nonvolatile material. If the source changes inks and uses the third option for compliance, the new inks shall not increase the potential to emit of the source.

D.1.2 Volatile Organic Compounds (VOC)

The total potential to emit of VOC from these printing activities, as well as the activities listed in Section D.2 and Section D.3, is less than one hundred (100) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) are not applicable.

Any change or modification which may increase the potential emissions of VOC to above one hundred (100) tons per twelve (12) consecutive month period must be approved by the Office of Air Quality before any such change may occur.

D.1.3 Hazardous Air Pollutants (HAP)

The potential to emit of any single hazardous air pollutant (HAP) from these printing operations, as well as the activities listed in Section D.2 and Section D.3, is less than ten (10) tons per twelve (12) consecutive month period. The potential to emit of any combination of HAPs from these printing operations, as well as the activities listed in Section D.2 and Section D.3, is less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) are not applicable.

Any change or modification which may increase the potential emissions of a single HAP to above ten (10) tons per twelve (12) consecutive month period or of any combination of HAPs to above twenty-five (25) tons per twelve (12) consecutive month period must be approved by the Office of Air Quality before any such change may occur.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.4 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2, and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Condition D.1.1, D.1.2, and D.1.3.
- (1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC and HAP usage for each month; and the total VOC shipped offsite for disposal; and
 - (5) The weight of VOCs and HAPs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). This is the same report as required in Condition D.2.8 and D.3.9.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (o) One (1) paint booth, identified as PB-1, equipped with an air atomization spray gun for wood furniture coating, at a maximum capacity of 0.14 wood parts per hour, with dry filters for over spray control.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.2.2 Volatile Organic Compounds (VOC)

The total potential to emit of VOC from this painting activity as well as the activities listed in Section D.1 and Section D.3, is less than one hundred (100) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) are not applicable.

Any change or modification which may increase the potential emissions of VOC to above one hundred (100) tons per twelve (12) consecutive month period must be approved by the Office of Air Quality before any such change may occur.

D.2.3 Hazardous Air Pollutants (HAP)

The potential to emit of any single hazardous air pollutant (HAP) from this painting operation, as well as the activities listed in Section D.1 and D.3, is less than ten (10) tons per twelve (12) consecutive month period. The potential to emit any combination of HAPs from this printing operation, as well as the activities listed in Section D.1 and Section D.3, is less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit) are not applicable.

Any change or modification which may increase the potential emissions of any single HAP to above ten (10) tons per twelve (12) consecutive month period or of any combination of HAPs to above twenty-five (25) tons per twelve (12) consecutive month period must be approved by the Office of Air Quality before any such change may occur.

D.2.4 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to CP-043-4575 and pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the spray booth shall not exceed the pounds per hour limitation calculated as E using the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.2.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control device.

Compliance Determination Requirements

D.2.6 Particulate Matter (PM)

Pursuant to CP-043-4575-00029, issued on August 4, 1995, and in order to comply with D.2.4, the dry filters for PM control shall be in operation and control emissions from the spray booth at all times that the spray booth is in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters when the paint booth is in operation. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Inspections shall be performed during each month or partial month that the spray booth was in operation of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.8 Record Keeping Requirements

- (a) To document compliance with conditions D.2.2 and D.2.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with VOC and HAP usage limits and/or the VOC and HAP emission limits in condition D.2.2 and D.2.3.
 - (1) The amount of VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data

sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC and HAP usage for each month and the total VOC shipped offsite for disposal; and
 - (5) The weight of VOCs and HAPs emitted to each compliance period.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). This is the same report as required in Condition D.1.6 and D.3.9.

SECTION D.3 FACILITY CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (p) One (1) wide double web flexographic printing press, identified as WDW-7, with a maximum line speed of seventy-five (75) feet per minute and a printing width of ten (10) inches.
- (q) Two (2) Tripress flexographic printing presses, identified as Tri-17 and Tri-18, both with a maximum line speed of seventy-five (75) feet per minute and a printing width of six (6) inches.
- (r) One (1) Mid Double Web flexographic printing press, identified as MDW-4, with a maximum line speed of seventy-five (75) feet per minute and a printing width of eight (8) inches.
- (s) One (1) Double Die Tripresses flexographic printing press, identified as DDTRI-5, with a maximum line speed of seventy-five (75) feet per minute and a printing width of eight (8) inches.
- (t) One (1) Narrow Double Web flexographic printing press, identified as NDW-6, with a maximum line speed of seventy-five (75) feet per minute and a printing width of five (5) inches.
- (u) Three (3) Webtron 450 flexographic printing presses, identified as 450-16, 450-17, and 450-18, each with a maximum line speed of one hundred and fifty (150) feet per minute and a printing width of four (4) inches.
- (v) Eight (8) Webtron 650 flexographic printing presses, identified as 650-22, 650-23, 650-24, 650-25, 650-26, 650-27, 650-28, and 650-29, each with a maximum line speed of one hundred and fifty (150) feet per minute and a printing width of six (6) inches.
- (w) Five (5) non-heatset offset printing presses, identified as Ryobi-6, Ryobi-7, Ryobi-8, Ryobi-9, and Ryobi-10, each with a maximum line speed of one hundred and ten (110) feet per minute and a printing area of ninety-three and half (93.5) square inches.
- (x) Three (3) DLI flexographic printing presses, identified as MAN -6 (with a maximum line speed of four hundred (400) feet per minute and a printing width of sixteen (16) inches), MAN-7 (with a maximum line speed of four hundred (400) feet per minute and a printing width of twenty-two (22) inches) and MAN-8 (with a maximum line speed of one hundred and fifty (150) feet per minute and a printing width of six and a half (6.5) inches).
- (y) Two (2) Xerox Docucolor 40 Digital Color Production Systems with a maximum line speed of forty (40) 82 x 11 pages per minute.
- (z) One (1) seamer with a maximum line speed of two hundred and twenty (220) millimeters per minute and a width of two hundred and fifty (250) millimeters.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

- D.3.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

- D.3.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.
- D.3.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operation Conditions

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.4 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), no owner or operator of a flexographic printing source shall allow the operation of the facility unless the volatile fraction of ink as it is applied to the substrate in the flexographic printing operation contains twenty-five percent (25%) by volume or less of organic solvent and seventy-five percent (75%) by volume or more of water; or the ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more nonvolatile material; or meets an emission limit of five-tenths (0.5) pounds of volatile organic compound per pound of solids in the ink.

D.3.5 Volatile Organic Compounds (VOC)

The total potential to emit of VOC from these printing activities, as well as the activities listed in Section D.1 and Section D.2, is less than one hundred (100) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) are not applicable.

Any change or modification which may increase the potential emissions of VOC to above one hundred (100) tons per twelve (12) consecutive month period must be approved by the Office of Air Quality before any such change may occur.

D.3.6 Hazardous Air Pollutants (HAP)

The potential to emit of any single hazardous air pollutant (HAP) from these printing operations, as well as the activities listed in Section D.1 and Section D.2, is less than ten (10) tons per twelve (12) consecutive month period. The potential to emit of any combination of HAPs from these printing operations, as well as the activities listed in Section D.1 and Section D.2, is less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) are not applicable.

Any change or modification which may increase the potential emissions of a single HAP to above ten (10) tons per twelve (12) consecutive month period or of any combination of HAPs to above twenty-five (25) tons per twelve (12) consecutive month period must be approved by the Office of Air Quality before any such change may occur.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.4, D.3.5, and D.3.6 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Condition D.3.4, D.3.5, and D.3.6.
- (1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC and HAP usage for each month and the total VOC shipped offsite for disposal; and
 - (5) The weight of VOCs and HAPs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.5 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). This is the same report as required in Condition D.1.6 and D.2.8.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Print Xcel dba Discount Labels, Inc.
Source Address: 4115 Profit Court, New Albany, Indiana 47150
Mailing Address: P.O. Box 709, New Albany, Indiana 47151-0709
FESOP No.: F043-14011-00029

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: _____

Printed Name: _____

Title/Position: _____

Phone Number: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Print Xcel dba Discount Labels, Inc.
Source Address: 4115 Profit Court, New Albany, Indiana 47150
Mailing Address: P.O. Box 709, New Albany, Indiana 47151-0709
FESOP No.: F043-14011-00029

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
 CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Print Xcel dba Discount Labels, Inc
Source Address: 4115 Profit Court, New Albany, Indiana 47150
Mailing Address: P.O. Box 709, New Albany, Indiana 47151-0709
FESOP No.: F043-14011-00029
Facility: All printing presses, paint booth
Parameter: VOC
Limit: Less than one hundred (100) tons per twelve (12) consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Print Xcel dba Discount Labels, Inc.
Source Address: 4115 Profit Court, New Albany, Indiana 47150
Mailing Address: P.O. Box 709, New Albany, Indiana 47151-0709
FESOP No.: F043-14011-00029

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

January 10, 2002

**Indiana Department of Environmental Management
Office of Air Quality**

**Addendum to the Technical Support Document
for Federally Enforceable State Operating Permit (FESOP) Renewal**

Source Background and Description

Source Name: Print Xcel dba Discount Labels, Inc.
Source Location: 4115 Profit Court, New Albany, Indiana 47150
County: Floyd
SIC Code: 2759
Operation Permit No.: F043-14011-00029
Permit Reviewer: ERG/KC

On November 9, 2001, the Office of Air Quality (OAQ) had a notice published in the New Albany Tribune, New Albany, Indiana, stating that Print Xcel dba Discount Labels, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate a label printing source with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On November 28, 2001, Print Xcel dba Discount Labels, Inc. submitted comments on the proposed FESOP Renewal. The summary of the comments is as follows:

Comment 1:

The source believes that the insignificant activity listed as A.3.(m)(2) should be listed with the other insignificant activities rather than being called out with the unique emission units meeting the noted exemption levels. The source would like this change to be made in the TSD as well.

Response to Comment 1:

IDEM agrees with the source. The insignificant activity listed as A.3(m)(2) was inadvertently placed with the unique emission units meeting the noted exemption levels. The activity was moved so that it is listed with the other insignificant activities.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(m) Exposure chambers ("towers", "columns"), for curing of ultraviolet inks and ultraviolet coatings where heat is the intended discharge; and

(mn) Emission units whose potential uncontrolled emissions meet the exemption levels specified in 326 IAC 2-1.1-3(d)(1):

(1) Various cleaning and maintenance materials with individual VOC emissions of

less than ten (10) tons per year, ~~and~~

~~(2) Exposure chambers ("towers", "columns"), for curing of ultraviolet inks and ultraviolet coatings where heat is the intended discharge.~~

This change was not made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 2:

The source noted that the unit description in A.2(m) currently says "...identified as WSW-1, each a with.." when it should say "...identified as WSW-1, with a.." They would like this typo to be corrected in A.2, D.1, and the TSD.

Response to Comment 2:

IDEM agrees that this typo must be corrected. The following changes were made to the permit:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (m) One (1) Wide Single Web flexographic printing press, identified as WSW-1, ~~each~~ with a maximum line speed of seventy-five (75) feet per minute and a printing width of twelve (12) inches.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (m) One (1) Wide Single Web flexographic printing press, identified as WSW-1, ~~each~~ with a maximum line speed of seventy-five (75) feet per minute and a printing width of twelve (12) inches.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

This change was not made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 3:

The source noted that in Condition D.1.1, there is a closing bracket at the end of the first paragraph that is unnecessary and should be removed.

Response to Comment 3:

The closing bracket was inadvertently placed in the permit and was therefore removed.

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), no owner or operator of a flexographic printing source shall allow the operation of the facility unless the volatile fraction of ink as it is applied to the substrate in the flexographic printing operation contains twenty-five percent (25%) by volume or less of organic solvent and seventy-five percent (75%) by volume or more of water; or the ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more nonvolatile material; or meets an emission limit of five-tenths (0.5) pounds of volatile organic compound per pound of solids in the ink.†

Comment 4:

The source suggested that the wording in Condition D.1.2 be altered. They feel that the first sentence should read "...from these printing activities as well as the activities in D.2 and D.3 is less..." in order to ensure that the units are referenced, not the VOC limitations in D.2.2 and D.3.5, as the emitting source. Additionally, the condition currently implies that there is a printing activity in D.2 when the unit is a paint booth.

Response to Comment 4:

IDEM agrees that the condition as written is confusing. Therefore the conditions was changed as follows:

D.1.2 Volatile Organic Compounds (VOC)

The total potential to emit of VOC from these printing activities, as well as ~~those~~ **the activities listed in Section D.2.2 and Section D.3.5**, is less than one hundred (100) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) are not applicable.

Comment 5:

The source suggested that the wording in Condition D.1.3 be altered. They feel that the first sentence should read "...from these printing activities as well as the activities in D.2 and D.3 is less..." in order to ensure that the units are referenced, not the HAP limitations, as the emitting source.

Response to Comment 5: IDEM agrees that the condition as written is confusing. Therefore the conditions was changed as follows:

D.1.3 Hazardous Air Pollutants (HAP)

The potential to emit of any single hazardous air pollutant (HAP) from these printing operations, as well as ~~those~~ **the activities listed in Section D.2 and Section D.3**, is less than ten (10) tons per twelve (12) consecutive month period. The potential to emit of any combination of HAPs from these printing operations, as well as ~~those~~ **the activities listed in Section D.2 and Section D.3**, is less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) are not applicable.

Comment 6:

The source feels that Condition D.1.4 (Preventive Maintenance Plan), D.2.4 (Preventive Maintenance Plan), and D.3.7 (Preventive Maintenance Plan) should be removed since there is no control equipment associated with the units and no single unit is large enough to trigger the requirements of 326 IAC 1-6-3.

Response to Comment 6:

Since the source is not taking a limit to keep out of an applicable requirement, no NSPS or NESHAP applies, there is no control device, and actual emissions do not exceed 25 tons per year, the preventive maintenance plan requirements for the units listed in Sections D.1 and D.3 were deleted.

~~D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.~~

~~D.3.7 Preventive Maintenance Plan [326 IAC 2-8-4(9)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.~~

The Preventive Maintenance Plan (D.2.5) for the paint booth in Section D.2 was not removed because there is an control device for PM and the allowables could exceed 10 pounds per hour.

Comment 7:

The source noticed that although referenced in Conditions D.1.3, D.2.7, and D.3.6, there is no condition stating a HAP limit for the spray booth in Section D.2. The source requests that a condition to limit HAPs be added to Section D.2 or the references in Conditions D.1.3, D.2.7, and D.3.6 be deleted.

Response to Comment 7:

The HAP limit was inadvertently left out of Section D.2. Therefore the following change was made to the permit:

D.2.3 Hazardous Air Pollutants (HAP)

The potential to emit of any single hazardous air pollutant (HAP) from this painting operation, as well as the activities listed in Section D.1 and Section D.3, is less than ten (10) tons per twelve (12) consecutive month period. The potential to emit of any combination of HAPs from this painting operation, as well as the activities listed in Section D.1 and Section D.3, is less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) are not applicable.

Any change or modification which may increase the potential emissions of a single HAP to above ten (10) tons per twelve (12) consecutive month period or of any combination of HAPs to above twenty-five (25) tons per twelve (12) consecutive month period must be approved by the Office of Air Quality before any such change may occur.

Comment 8:

The source suggested that the wording in Condition D.2.2 be altered. They feel that the first sentence should read "...from these printing activities as well as the activities in D.1 and D.3 is less..." in order to ensure that the units are referenced, not the VOC limitations in D.1.2 and D.3.5, as the emitting source. Additionally, the condition currently implies that there is a printing activity in D.2 when the unit is a paint booth.

Response to Comment 8:

IDEM agrees that the condition as written is confusing. Therefore the conditions was changed as follows:

D.2.2 Volatile Organic Compounds (VOC)

The total potential to emit of VOC from ~~these printing activities~~ **this painting activity**, as well as ~~these the activities listed~~ in **Section D.1-2** and **Section D.3-5**, is less than one hundred (100) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) are not applicable.

Comment 9:

The source suggested that the wording in Condition D.3.5 be altered. They feel that the first sentence should read "...from these printing activities as well as the activities in D.1 and D.2 is less..." in order to ensure that the units are referenced, not the VOC limitations in D.1.2 and D.2.2, as the emitting source. Additionally, the condition currently implies that there is a printing activity in D.2 when the unit is a paint booth.

Response to Comment 9:

IDEM agrees that the condition as written is confusing. Therefore the conditions was changed as follows:

D.3.5 Volatile Organic Compounds (VOC)

The total potential to emit of VOC from these printing activities, as well as ~~these the activities listed~~ in **Section D.1-2** and **Section D.2-2**, is less than one hundred (100) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) are not applicable.

Comment 10:

The source suggested that the wording in Condition D.3.6 be altered. They feel that the first sentence should read "...from these printing activities as well as the activities in D.1 and D.2 is less..." in order to ensure that the units are referenced, not the VOC limitations in D.1.3, as the emitting source. Additionally, the condition currently implies that there is a printing activity in D.2 when the unit is a paint booth.

Response to Comment 10:

IDEM agrees that the condition as written is confusing. Therefore the conditions was changed as follows:

D.3.6 Hazardous Air Pollutants (HAP)

The potential to emit of any single hazardous air pollutant (HAP) from these printing operations, as well as ~~these the activities listed~~ in **Section D.1-3** and ~~the paint booth~~ **Section D.2**, is less than ten (10) tons per twelve (12) consecutive month period. The potential to emit of any combination of HAPs from these printing operations, as well as ~~these the activities listed~~ in **Section D.1-3** and ~~the paint booth~~ **Section D.2**, is less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) are not applicable.

Upon further review, IDEM, OAQ has made the following changes to the permit:

1. According to 326 IAC 2-8-6(b), all terms and conditions in a FESOP, including any provisions designed to limit a source's potential to emit, are enforceable by the U.S. EPA. Therefore, the following changes were made:

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. ~~326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.~~

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. ~~326 IAC 9-1-2 is not federally enforceable.~~

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). ~~326 IAC 6-4-2(4) is not federally enforceable.~~

2. To clarify the facility specific events that would not qualify as a deviation, the following changes were made:

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. ~~Deviations that are required to be reported by an applicable requirement~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit**, shall be reported according to the schedule stated in the applicable requirement and ~~it does~~ not need to be included in this report.

~~The notification by the Permittee~~ **Quarterly Deviation and Compliance Monitoring Report** does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit: ~~or a rule. It does not include:~~

(1) ~~An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

(2) ~~Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

- (c) **Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.**

3. To clarify that the asbestos notification should be certified by the owner or operator and not the responsible official, the following changes were made:

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

4. After discussions with EPA, the following change was made:

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

5. The following condition was reorganized in an attempt to clarify its intent:

C.13 Compliance Monitoring Response Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to **prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:** ~~implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:~~

(1) ~~This condition;~~

(2) ~~The Compliance Determination Requirements in Section D of this permit;~~

(3) ~~The Compliance Monitoring Requirements in Section D of this permit; and~~

(4) ~~The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D~~

of this permit.

- (1) **Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.**
 - (2) **If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.**
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition **as follows:** ~~Failure to take reasonable response steps may constitute a violation of the permit.~~
 - (1) **Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or**
 - (2) **If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.**
 - (3) **If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.**
 - (4) **Failure to take reasonable response steps shall constitute a violation of the permit.**
- (c) ~~Upon investigation of a compliance monitoring excursion, the~~ **The** Permittee is ~~excused from taking~~ **not required to take any** further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment **and** - ~~This shall be an excuse from taking further response steps providing that~~ prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.

- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) **When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emissions limitation has occurred, the Permittee shall report such deviations pursuant to Section B - Deviations from Permit Requirements and Conditions.**
- (e d) ~~Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.~~ **The Permittee shall record all instances when response steps are taken.** In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f e) **Except as otherwise provided by a rule or provided specifically in Section D, all Air monitoring as required in Section D shall be performed at all times when the equipment emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.** ~~If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.~~
- (f) ~~At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.~~
6. Because of the change to Condition C.13, the following changes were made:
- D.2.6 Monitoring
-
- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters when the paint booth is in operation. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance ~~Monitoring~~ **Response Plan - Failure to Take Response Steps**, shall be considered a violation of this permit.
- (b) Inspections shall be performed during each month or partial month that the spray booth was in operation of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance ~~Monitoring~~ **Response Plan - Failure to Take Response Steps**, shall be considered a violation of this permit.
7. Condition D.2.5 (Particulate Matter (PM)) (now D.2.6) contained an incorrect condition reference and a typo. These were fixed.

D.2.56 Particulate Matter (PM)

Pursuant to CP-043-4575-00029, ~~issued on~~ issued on August 4, 1995, and in order to comply with **D.2.4 D.2.2**, the dry filters for PM control shall be in operation and control emissions from the spray booth at all times that the spray booth is in operation.

8. A typo in Condition D.3.5 was corrected.

D.3.5 Volatile Organic Compounds (VOC)

The total potential to emit of VOC from these printing activities, as well as the activities listed in Section D.1 and Section D.2, is less than one hundred (100) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) are not applicable.

Any change or modification which may increase the potential emissions of VOC to above one hundred (100) tons per twelve (12) consecutive month period: ~~mm~~ Must be approved by the Office of Air Quality before any such change may occur.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP) Renewal

Source Background and Description

Source Name: Print Xcel dba Discount Labels, Inc.
Source Location: 4115 Profit Court, New Albany, Indiana 47150
County: Floyd
SIC Code: 2759
Operation Permit No.: F043-14011-00029
Permit Reviewer: ERG/KC

The Office of Air Quality (OAQ) has reviewed a FESOP Renewal application from Print Xcel dba Discount Labels, Inc. relating to the operation of a label printing facility. Print Xcel dba Discount Labels, Inc. was issued FESOP 043-5462-00029 on December 5, 1996.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Five (5) wide double web flexographic printing presses, identified as WDW-1, WDW-2, WDW-3, WDW-4, and WDW-6, each with a maximum line speed of seventy-five (75) feet per minute and a printing width of ten (10) inches.
- (b) Fourteen (14) Tripress flexographic printing presses, identified as Tri-1, Tri-2, Tri-3, Tri-4, Tri-5, Tri-7, Tri-8, Tri-10, Tri-11, Tri-12, Tri-13, Tri-14, Tri-15, and Tri-16, each with a maximum line speed of seventy-five (75) feet per minute and a printing width of six (6) inches.
- (c) Three (3) Mid Double Web flexographic printing presses identified as MDW-1, MDW-2, and MDW-3, each with a maximum line speed of seventy-five (75) feet per minute and a printing width of eight (8) inches.
- (d) Four (4) Double Die Tripresses flexographic printing presses, identified as DDTRI-1, DDTRI-2, DDTRI-3, and DDTRI-4, each with a maximum line speed of seventy-five (75) feet per minute and a printing width of eight (8) inches.
- (e) Four (4) Narrow Double Web flexographic printing presses, identified as NDW-2, NDW-3, NDW-4, and NDW-5, each with a maximum line speed of seventy-five (75) feet per minute and a printing width of five (5) inches.
- (f) Fifteen (15) Webtron 450 flexographic printing presses, identified as 450-1, 450-2, 450-3, 450-4, 450-5, 450-6, 450-7, 450-8, 450-9, 450-10, 450-11, 450-12, 450-13, 450-14,

and 450-15, each with a maximum line speed of one hundred and fifty (150) feet per minute and a printing width of four (4) inches.

- (g) Twenty-one (21) Webtron 650 flexographic printing presses, identified as 650-1, 650-2, 650-3, 650-4, 650-5, 650-6, 650-7, 650-8, 650-9, 650-10, 650-11, 650-12, 650-13, 650-14, 650-15, 650-16, 650-17, 650-18, 650-19, 650-20, and 650-21, each with a maximum line speed of one hundred and fifty (150) feet per minute and a printing width of six (6) inches.
- (h) Five (5) Single Web flexographic printing presses, identified as SW-1, SW-2, SW-3, SW-4, and SW-5, each with a maximum line speed of seventy-five (75) feet per minute and a printing width of five and a half (5.5) inches.
- (i) One (1) Barricade Banner flexographic printing press, identified as BB-1, with a maximum line speed of one hundred and fifty (150) feet per minute and a printing width of five (5) inches.
- (j) Two (2) Manhasset flexographic printing presses, identified as MAN-2 and MAN-3, each with a maximum line speed of one hundred and fifty (150) feet per minute and a printing width of twelve (12) inches.
- (k) One (1) Manhasset flexographic printing press, identified as MAN-4, with a maximum line speed of one hundred and fifty (150) feet per minute and a printing width of thirteen (13) inches.
- (l) Five (5) non-heatset offset printing presses, identified as Ryobi-1, Ryobi-2, Ryobi-3, Ryobi-4, and Ryobi-5, each with a maximum line speed of one hundred and ten (110) feet per minute and a printing area of ninety-three and a half (93.5) square inches.
- (m) One (1) Wide Single Web flexographic printing press, identified as WSW-1, each with a maximum line speed of seventy-five (75) feet per minute and a printing width of twelve (12) inches.
- (n) One (1) DLI flexographic printing press, identified as MAN-5, with a maximum line speed of two hundred (200) feet per minute and a printing width of twelve (12) inches.
- (o) One (1) paint booth, identified as PB-1, equipped with an air atomization spray gun for wood furniture coating, at a maximum capacity of 0.14 wood parts per hour, with dry filters for over spray control.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this renewal review process.

New Emission Units and Pollution Control Equipment Receiving New Source Review Approval

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-8-4(11):

- (p) One (1) wide double web flexographic printing press, identified as WDW-7, with a maximum line speed of seventy-five (75) feet per minute and a printing width of ten (10) inches.
- (q) Two (2) Tripress flexographic printing presses, identified as Tri-17 and Tri-18, both with a maximum line speed of seventy-five (75) feet per minute and a printing width of six (6) inches.

- (r) One (1) Mid Double Web flexographic printing press, identified as MDW-4, with a maximum line speed of seventy-five (75) feet per minute and a printing width of eight (8) inches.
- (s) One (1) Double Die Tripresses flexographic printing press, identified as DDTRI-5, with a maximum line speed of seventy-five (75) feet per minute and a printing width of eight (8) inches.
- (t) One (1) Narrow Double Web flexographic printing press, identified as NDW-6, with a maximum line speed of seventy-five (75) feet per minute and a printing width of five (5) inches.
- (u) Three (3) Webtron 450 flexographic printing presses, identified as 450-16, 450-17, and 450-18, each with a maximum line speed of one hundred and fifty (150) feet per minute and a printing width of four (4) inches.
- (v) Eight (8) Webtron 650 flexographic printing presses, identified as 650-22, 650-23, 650-24, 650-25, 650-26, 650-27, 650-28, and 650-29, each with a maximum line speed of one hundred and fifty (150) feet per minute and a printing width of six (6) inches.
- (w) Five (5) non-heatset offset printing presses, identified as Ryobi-6, Ryobi-7, Ryobi-8, Ryobi-9, and Ryobi-10, each with a maximum line speed of one hundred and ten (110) feet per minute and a printing area of ninety-three and a half (93.5) square inches.
- (x) Three (3) DLI flexographic printing presses, identified as MAN -6 (with a maximum line speed of four hundred (400) feet per minute and a printing width of sixteen (16) inches), MAN-7 (with a maximum line speed of four hundred (400) feet per minute and a printing width of twenty-two (22) inches) and MAN-8 (with a maximum line speed of one hundred and fifty (150) feet per minute and a printing width of six and a half (6.5) inches).
- (y) Two (2) Xerox Docucolor 40 Digital Color Production Systems with a maximum line speed of forty (40) 82 x 11 pages per minute.
- (z) One (1) seamer with a maximum line speed of two hundred and twenty (220) millimeters per minute and a width of two hundred and fifty (250) millimeters.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;
- (b) Machining where an aqueous cutting coolant continuously floods the machining interface;
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (d) Closed loop heating and cooling systems;
- (e) Infrared cure equipment;
- (f) Solvent recycling systems with batch capacity less than or equal to 100 gallons;
- (g) Activities associated with the treatment of wastewater streams with an oil an grease content less than or equal to 1% by volume,

- (h) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;
- (i) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (j) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (k) On-site fire and emergency response training approved by the department;
- (l) Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower; and
- (m) Emission units whose potential uncontrolled emissions meet the exemption levels specified in 326 IAC 2-1.1-3(d)(1):
 - (1) Various cleaning and maintenance materials with individual VOC emissions of less than ten (10) tons per year; and
 - (2) Exposure chambers ("towers", "columns"), for curing of ultraviolet inks and ultraviolet coatings where heat is the intended discharge.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) AAF043-11020-00029, issued on July 20, 1999;
- (b) AAF043-10728-00029, issued on May 5, 1999;
- (c) AAF043-9841-00029, issued on September 1, 1998;
- (d) AAF043-9543-00029, issued on March 24, 1998;
- (e) AAF043-9485-00029, issued on March 2, 1998;
- (f) AAF043-9147-00029, issued on November 19, 1997;
- (g) MMF043-8437-00029, issued on June 18, 1997;
- (h) AAF043-8270-00029, issued on April 2, 1997; and
- (i) F043-5462-00029, issued on December 5, 1996 and expiring on December 5, 2001.

All conditions from previous approvals were incorporated into this FESOP except:

All monthly limits were revised to annual limits expressed as a twelve (12) month consecutive period to conform with current IDEM, OAQ requirement.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on March 1, 2001.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 23). Emission calculations were taken from F043-5462-00029 and new equipment was added.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/year)
PM	0.16
PM-10	0.16
SO ₂	0
VOC	97.03
CO	0
NO _x	0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration. VOC emissions take into account VOC material shipped off-site for disposal.

HAPs	Unrestricted Potential Emissions (tons/year)
Glycol Ether	0.23
Toluene	0.22
Xylene	0.36
Methanol	0.07
MEK	0.09
Ethylene Glycol	0.68
1, 2, 4 Trimethylbenzene	0.57
Cumene	0.08
TOTAL	2.3

- (a) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on December 5, 1996, has opted to remain a FESOP, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Facility	Potential to Emit After Issuance (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	Total HAPs
Printing Presses and Surface Coating	0.16	0.16	0	97.03	0	0	2.3
Insignificant Activity	0	0	0	0	0	0	0
Total Emissions	0.16	0.16	0	Less than 100	0	0	24.00 tpy for a combination of HAPs 9.00 tpy for a single HAP

County Attainment Status

The source is located in Floyd County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Moderate
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Floyd County has been designated as nonattainment for ozone.
- (b) Floyd County has been classified as attainment or unclassifiable for PM10, SO₂, NO₂, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source. 40 CFR Part 60, Subpart QQ (Standards of Performance for the Graphic Art Industry: Publication Rotogravure Printing) and Subpart FFF (Standards of Performance for Flexible Vinyl and Urethane Coating and Printing) do not apply because rotogravure printing presses are not operated at the source.

- (b) There are no National Emission standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR 63) applicable to this source. 40 CFR 63, Subpart KK is not applicable because publication and product and packaging rotogravure printing presses are not operated at the source. Flexographic printing presses are operated at the source, but not as defined by 40 CFR 63.822. 40 CFR 63, Subpart JJ does not apply because this source is not a major source of HAPs.

State Rule Applicability - Entire Source

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The source will limit emissions of a single HAP to less than 10 tons per year and the emissions of a combination of HAPs to less than 25 tons per year. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC and is in Floyd County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 2-8-4 (FESOP)

This source has potential emissions below major levels and therefore could be a MSOP. However, the source has elected to remain a FESOP because potential VOC emissions are very close to 100 tons per year. The source changes inks, additives, and cleaners relatively often and does not want their permit level to change with each ink, additive, or cleaner change.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

This source is not subject to 326 IAC 8-7 because the source as a whole limits emissions of VOC to less than 100 tons per year of VOC and each individual unit is limited to less than 10 tons per year of VOC.

326 IAC 10 (Nitrogen Oxides)

This source is not subject to 326 IAC 10 (Nitrogen Oxides) because the source emits below the applicability levels of the rule.

State Rule Applicability - Printing Presses

326 IAC 6-3-2 (Process Operations)

The source is not subject to 326 IAC 6-3-2 Process Operations because the source does not emit any PM.

326 IAC 8-5-5 (Graphic Arts Operations)

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), no owner or operator of a flexographic printing source shall allow the operation of the facility unless the volatile fraction of ink as it is applied to the substrate in the flexographic printing operation contains twenty-five percent (25%) by volume or less of organic solvent and seventy-five percent (75%) by volume or more of water; or the ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more nonvolatile material; or for packaging rotogravure and flexographic printing processes, the ink as it is applied to the substrate meets an emission limit of five-tenths (0.5) pounds of volatile organic compound per pound of solids in the ink.

Currently, the volatile fraction of ink as it is applied to the substrate at the source contains twenty-five percent (25%) by volume or less of organic solvent and seventy-five percent (75%) by volume or more of water; or the ink as it is applied to the substrate, less water, contains sixty

percent (60%) by volume or more nonvolatile material. If the source changes inks and uses the third option for compliance, the new inks shall not increase the potential to emit of the source.

State Rule Applicability - Spray Booth

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coatings applied to wood furniture and/or wood components shall utilize one or more of the following application methods:

- Airless Spray Application
- Air-Assisted Airless Spray Application
- [Includes High Volume Low Pressure HVLP]
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

326 IAC 8-11 (Wood Furniture Coating)

The wood furniture manufacturing operation has the potential to emit 1.88 tons VOC per year, therefore it is not subject to the requirements of 326 IAC 8-11.

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the paint booth shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The dry filters shall be in operation at all times the spray booth is in operation, in order to comply with this limit.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The spray booth has applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters when the paint booth is in operation. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (b) Inspections shall be performed during each month or partial month that the spray booth was in operation of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

These monitoring conditions are necessary because the dry filters for the spray booth must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this label printing facility shall be subject to the conditions of the attached Renewal FESOP No.: F013-14011-00029.

Appendix A: Emission Calculations
VOC from Printing Press Operations
WDW-1, WDW-2, WDW-3, WDW-4, WDW-6, WDW-7
Company Name: Print Xcel dba Discount Labels
Address City IN Zip: 4115 Profit Court, New Albany, IN 47150
Plant ID: 043-00029
Permit Number: F043-14011-00029
Reviewer: ERG/KC
Date: 06/19/01

Press ID	Maximum Line Speed (Feet)	Maximum Print Width (inches)	Throughput (MMin ² /year)
Flexograph #1	75	10	4730.4

Ink Name Press ID	Maximum Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	VOC Emissions (ton/yr)
Inks				
VS846 SonaPrint Pant Reflex Blue	0.6800	26.00%	100.00%	0.42
Additives				
Print Clean - Print Additive	0.0038	100.00%	100.00%	0.01
L/V Externder Varnish	0.0312	7.42%	100.00%	0.01
Aqua Discount Refresh	0.0172	13.33%	100.00%	0.01
Propylene Glycol	0.0019	100.00%	100.00%	0.00
L-1196	0.0175	22.56%	100.00%	0.01
Remaining Additives	0.0159	9.50%	100.00%	0.00
Cleaning Solvents				
Graphex Chrome Roller Cleaner	0.0002	10.00%	100.00%	0.00
A-60 Press Cleaner	0.0199	96.81%	100.00%	0.05
Clear Cell Anilox	0.0089	13.00%	100.00%	0.00
Adhesive Remover	0.0145	95.60%	100.00%	0.03
152	0.0874	12.90%	100.00%	0.03
Isopropyl Alcohol	0.0608	100.00%	100.00%	0.14
Plate Wash	0.9445	100.00%	100.00%	2.23

Total VOC Emissions (ton/yr) for 1 unit: 2.94
Total VOC Emissions (ton/yr) for 6 units: 17.64

Methodology

Throughput (MMin²/yr) = Maximum line speed (ft/min) * (12 in/1 ft) * Maximum print width (in) * (60 min/1 hr) * (8760 hr/1 yr) * (1/1000000)

VOC Emissions (ton/yr) = Maximum Coverage (lb/MMin²) * Weight percent Volatiles * Flash off * Throughput * (1 ton/2000 lb)

NOTE: Heat set offset printing has an assumed flash off of 80%. Other type of printers have a flash off of 100%
 Flexograph #1 consists of WDW-1, WDW-2, WDW-3, WDW-4, WDW-6, and WDW-7

Appendix A: Emission Calculations**VOC from Printing Press Operations**

Tri-1, Tri-2, Tri-3, Tri-4, Tri-5, Tri-7, Tri-8, Tri-10, Tri-11, Tri-12, Tri-13, Tri-14, Tri-15, Tri-16, Tri-17, and Tri-18

Company Name: Print Xcel dba Discount Labels

Address City IN Zip: 4115 Profit Court, New Albany, IN 47150

Plant ID: 043-00029

Permit Number: F043-14011-00029

Reviewer: ERG/KC

Date: 06/19/01

Press ID	Maximum Line Speed (Feet)	Maximum Print Width (inches)	Throughput (MMin ² /year)
Flexograph #2	75	6	2838.24

Ink Name Press ID	Maximum Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	VOC Emissions (ton/yr)
Inks				
VS846 SonaPrint Pant Reflex Blue	0.6800	26.00%	100.00%	0.25
Additives				
Print Clean - Print Additive	0.0038	100.00%	100.00%	0.01
L/V Externder Varnish	0.0312	7.42%	100.00%	0.00
Aqua Discount Refresh	0.0172	13.33%	100.00%	0.00
Propylene Glycol	0.0019	100.00%	100.00%	0.00
L-1196	0.0175	22.56%	100.00%	0.01
Remaining Additives	0.0159	9.50%	100.00%	0.00
Cleaning Solvents				
Graphex Chrome Roller Cleaner	0.0002	10.00%	100.00%	0.00
A-60 Press Cleaner	0.0199	96.81%	100.00%	0.03
Clear Cell Anilox	0.0089	13.00%	100.00%	0.00
Adhesive Remover	0.0145	95.60%	100.00%	0.02
152	0.0874	12.90%	100.00%	0.02
Isopropyl Alcohol	0.0608	100.00%	100.00%	0.09
Plate Wash	0.9445	100.00%	100.00%	1.34

Total VOC Emissions (ton/yr) for 1 unit: 1.76
Total VOC Emissions (ton/yr) for 16 units: 28.23

MethodologyThroughput (MMin²/yr) = Maximum line speed (ft/min) * (12 in/1 ft) * Maximum print width (in) * (60 min/1 hr) * (8760 hr/1 yr) * (1/1000000)VOC Emissions (ton/yr) = Maximum Coverage (lb/MMin²) * Weight percent Volatiles * Flash off * Throughput * (1 ton/2000 lb)

NOTE: Heat set offset printing has an assumed flash off of 80%. Other type of printers have a flash off of 100%

Flexograph #2 consists of Tri-1, Tri-2, Tri-3, Tri-4, Tri-5, Tri-7, Tri-8, Tri-10,

Tri-11, Tri-12, Tri-13, Tri-14, Tri-15, Tri-16, Tri-17, and Tri-18

Appendix A: Emission Calculations
VOC from Printing Press Operations
MDW-1, MDW-2, MDW-3, MDW-4
Company Name: Print Xcel dba Discount Labels
Address City IN Zip 4115 Profit Court, New Albany, IN 47150
Plant ID: 043-00029
Permit Number: F043-14011-00029
Reviewer: ERG/KC
Date: 06/19/01

Press ID	Maximum Line Speed (Feet)	Maximum Print Width (inches)	Throughput (MMin ² /year)
Flexograph #3	75	8	3784.32

Ink Name Press ID	Maximum Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	VOC Emissions (ton/yr)
Inks				
VS846 SonaPrint Pant Reflex Blue	0.6800	26.00%	100.00%	0.33
Additives				
Print Clean - Print Additive	0.0038	100.00%	100.00%	0.01
L/V Externder Varnish	0.0312	7.42%	100.00%	0.00
Aqua Discount Refresh	0.0172	13.33%	100.00%	0.00
Propylene Glycol	0.0019	100.00%	100.00%	0.00
L-1196	0.0175	22.56%	100.00%	0.01
Remaining Additives	0.0159	9.50%	100.00%	0.00
Cleaning Solvents				
Graphex Chrome Roller Cleaner	0.0002	10.00%	100.00%	0.00
A-60 Press Cleaner	0.0199	96.81%	100.00%	0.04
Clear Cell Anilox	0.0089	13.00%	100.00%	0.00
Adhesive Remover	0.0145	95.60%	100.00%	0.03
152	0.0874	12.90%	100.00%	0.02
Isopropyl Alcohol	0.0608	100.00%	100.00%	0.11
Plate Wash	0.9445	100.00%	100.00%	1.79

Total VOC Emissions (ton/yr) for 1 unit: 2.35
Total VOC Emissions (ton/yr) for 4 units: 9.41

Methodology

Throughput (MMin²/yr) = Maximum line speed (ft/min) * (12 in/1 ft) * Maximum print width (in) * (60 min/1 hr) * (8760 hr/1 yr) * (1/1000000)

VOC Emissions (ton/yr) = Maximum Coverage (lb/MMin²) * Weight percent Volatiles * Flash off * Throughput * (1 ton/2000 lb)

NOTE: Heat set offset printing has an assumed flash off of 80%. Other type of printers have a flash off of 100%
 Flexograph #3 consists of MDW-1, MDW-2, MDW-3, and MDW-4

Appendix A: Emission Calculations
VOC from Printing Press Operations
DDTRI-1, DDTRI-2, DDTRI-3, DDTRI-4, DDTRI-5
Company Name: Print Xcel dba Discount Labels
Address City IN Zip: 4115 Profit Court, New Albany, IN 47150
Plant ID: 043-00029
Permit Number: F043-14011-00029
Reviewer: ERG/KC
Date: 06/19/01

Press ID	Maximum Line Speed (Feet)	Maximum Print Width (inches)	Throughput (MMin ² /year)
Flexograph #4	75	8	3784.32

Ink Name Press ID	Maximum Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	VOC Emissions (ton/yr)
Inks				
VS846 SonaPrint Pant Reflex Blue	0.6800	26.00%	100.00%	0.33
Additives				
Print Clean - Print Additive	0.0038	100.00%	100.00%	0.01
L/V Externder Varnish	0.0312	7.42%	100.00%	0.00
Aqua Discount Refresh	0.0172	13.33%	100.00%	0.00
Propylene Glycol	0.0019	100.00%	100.00%	0.00
L-1196	0.0175	22.56%	100.00%	0.01
Remaining Additives	0.0159	9.50%	100.00%	0.00
Cleaning Solvents				
Graphex Chrome Roller Cleaner	0.0002	10.00%	100.00%	0.00
A-60 Press Cleaner	0.0199	96.81%	100.00%	0.04
Clear Cell Anilox	0.0089	13.00%	100.00%	0.00
Adhesive Remover	0.0145	95.60%	100.00%	0.03
152	0.0874	12.90%	100.00%	0.02
Isopropyl Alcohol	0.0608	100.00%	100.00%	0.11
Plate Wash	0.9445	100.00%	100.00%	1.79

Total VOC Emissions (ton/yr) for 1 unit: 2.35
Total VOC Emissions (ton/yr) for 5 units: 11.76

Methodology

Throughput (MMin²/yr) = Maximum line speed (ft/min) * (12 in/1 ft) * Maximum print width (in) * (60 min/1 hr) * (8760 hr/1 yr) * (1/1000000)

VOC Emissions (ton/yr) = Maximum Coverage (lb/MMin²) * Weight percent Volatiles * Flash off * Throughput * (1 ton/2000 lb)

NOTE: Heat set offset printing has an assumed flash off of 80%. Other type of printers have a flash off of 100%
 Flexograph #4 consists of DDTRI-1, DDTRI-2, DDTRI-3, DDTRI-4, and DDTRI-5

Appendix A: Emission Calculations
VOC from Printing Press Operations
NDW-1, NDW-2, NDW-3, NDW-4, NDW-6
Company Name: Print Xcel dba Discount Labels
Address City IN Zip: 4115 Profit Court, New Albany, IN 47150
Plant ID: 043-00029
Permit Number: F043-14011-00029
Reviewer: ERG/KC
Date: 06/19/01

Press ID	Maximum Line Speed (Feet)	Maximum Print Width (inches)	Throughput (MMin ² /year)
Flexograph #5	75	5	2365.2

Ink Name Press ID	Maximum Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	VOC Emissions (ton/yr)
Inks				
VS846 SonaPrint Pant Reflex Blue	0.6800	26.00%	100.00%	0.21
Additives				
Print Clean - Print Additive	0.0038	100.00%	100.00%	0.00
L/V Externder Varnish	0.0312	7.42%	100.00%	0.00
Aqua Discount Refresh	0.0172	13.33%	100.00%	0.00
Propylene Glycol	0.0019	100.00%	100.00%	0.00
L-1196	0.0175	22.56%	100.00%	0.00
Remaining Additives	0.0159	9.50%	100.00%	0.00
Cleaning Solvents				
Graphex Chrome Roller Cleaner	0.0002	10.00%	100.00%	0.00
A-60 Press Cleaner	0.0199	96.81%	100.00%	0.02
Clear Cell Anilox	0.0089	13.00%	100.00%	0.00
Adhesive Remover	0.0145	95.60%	100.00%	0.02
152	0.0874	12.90%	100.00%	0.01
Isopropyl Alcohol	0.0608	100.00%	100.00%	0.07
Plate Wash	0.9445	100.00%	100.00%	1.12

Total VOC Emissions (ton/yr) for 1 unit: 1.47
Total VOC Emissions (ton/yr) for 5 units: 7.35

Methodology

Throughput (MMin²/yr) = Maximum line speed (ft/min) * (12 in/1 ft) * Maximum print width (in) * (60 min/1 hr) * (8760 hr/1 yr) * (1/1000000)

VOC Emissions (ton/yr) = Maximum Coverage (lb/MMin²) * Weight percent Volatiles * Flash off * Throughput * (1 ton/2000 lb)

NOTE: Heat set offset printing has an assumed flash off of 80%. Other type of printers have a flash off of 100%
 Flexograph #5 consists of NDW-2, NDW-3, NDW-4, NDW-5, and NDW-6

Appendix A: Emission Calculations**VOC from Printing Press Operations**

450-1, 450-2, 450-3, 450-4, 450-5, 450-6, 450-7, 450-8, 450-9, 450-10, 450-11, 450-12, 450-13, 450-14, 450-15, 450-16, 450-17, 450-18

Company Name: Print Xcel dba Discount Labels

Address City IN Zip 4115 Profit Court, New Albany, IN 47150

Plant ID: 043-00029

Permit Number: F043-14011-00029

Reviewer: ERG/KC

Date: 06/19/01

Press ID	Maximum Line Speed (Feet)	Maximum Print Width (inches)	Throughput (MMin ² /year)
Flexograph #6	150	4	3784.32

Ink Name Press ID	Maximum Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	VOC Emissions (ton/yr)
Inks				
VS846 SonaPrint Pant Reflex Blue	0.6800	26.00%	100.00%	0.33
Additives				
Print Clean - Print Additive	0.0038	100.00%	100.00%	0.01
L/V Extender Varnish	0.0312	7.42%	100.00%	0.00
Aqua Discount Refresh	0.0172	13.33%	100.00%	0.00
Propylene Glycol	0.0019	100.00%	100.00%	0.00
L-1196	0.0175	22.56%	100.00%	0.01
Remaining Additives	0.0159	9.50%	100.00%	0.00
Cleaning Solvents				
Graphex Chrome Roller Cleaner	0.0002	10.00%	100.00%	0.00
A-60 Press Cleaner	0.0199	96.81%	100.00%	0.04
Clear Cell Anilox	0.0089	13.00%	100.00%	0.00
Adhesive Remover	0.0145	95.60%	100.00%	0.03
152	0.0874	12.90%	100.00%	0.02
Isopropyl Alcohol	0.0608	100.00%	100.00%	0.11
Plate Wash	0.9445	100.00%	100.00%	1.79

Total VOC Emissions (ton/yr) for 1 unit: 2.35

Total VOC Emissions (ton/yr) for 18 units: 42.35

MethodologyThroughput (MMin²/yr) = Maximum line speed (ft/min) * (12 in/1 ft) * Maximum print width (in) * (60 min/1 hr) * (8760 hr/1 yr) * (1/1000000)VOC Emissions (ton/yr) = Maximum Coverage (lb/MMin²) * Weight percent Volatiles * Flash off * Throughput * (1 ton/2000 lb)

NOTE: Heat set offset printing has an assumed flash off of 80%. Other type of printers have a flash off of 100%

Flexograph #6 consists of 450-1, 450-2, 450-3, 450-4, 450-5, 450-6, 450-7, 450-8, 450-9, 450-10, 450-11, 450-12, 450-13, 450-14, 450-15, 450-16, 450-17, and 450-18
450-10, 450-11, 450-12, 450-13, 450-14, 450-15, 450-16, 450-17, and 450-18

Appendix A: Emission Calculations**VOC from Printing Press Operations**

650-1, 650-2, 650-3, 650-4, 650-5, 650-6, 650-7, 650-8, 650-9, 650-10, 650-11, 650-12, 650-13, 650-14, 650-15,
650-16, 650-17, 650-18, 650-19, 650-20, 650-21, 650-22, 650-23, 650-24, 650-25, 650-26, 650-27, 650-28, 650-29

Company Name: Print Xcel dba Discount Labels

Address City IN Zi 4115 Profit Court, New Albany, IN 47150

Plant ID: 043-00029

Permit Number: F043-14011-00029

Reviewer: ERG/KC

Date: 06/19/01

Press ID	Maximum Line Speed (Feet)	Maximum Print Width (inches)	Throughput (MMin ² /year)
Flexograph #7	150	6	5676.48

Ink Name Press ID	Maximum Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	VOC Emissions (ton/yr)
Inks				
VS846 SonaPrint Pant Reflex Blue	0.6800	26.00%	100.00%	0.50
Additives				
Print Clean - Print Additive	0.0038	100.00%	100.00%	0.01
L/V Externder Varnish	0.0312	7.42%	100.00%	0.00
Aqua Discount Refresh	0.0172	13.33%	100.00%	0.00
Propylene Glycol	0.0019	100.00%	100.00%	0.00
L-1196	0.0175	22.56%	100.00%	0.00
Remaining Additives	0.0159	9.50%	100.00%	0.00
Cleaning Solvents				
Graphex Chrome Roller Cleaner	0.0002	10.00%	100.00%	0.00
A-60 Press Cleaner	0.0199	96.81%	100.00%	0.05
Clear Cell Anilox	0.0089	13.00%	100.00%	0.00
Adhesive Remover	0.0145	95.60%	100.00%	0.04
152	0.0874	12.90%	100.00%	0.03
Isopropyl Alcohol	0.0608	100.00%	100.00%	0.17
Plate Wash	0.9445	100.00%	100.00%	2.68

Total VOC Emissions (ton/yr) for 1 unit: 3.50
Total VOC Emissions (ton/yr) for 29 units: 101.48

Methodology

Throughput (MMin²/yr) = Maximum line speed (ft/min) * (12 in/1 ft) * Maximum print width (in) * (60 min/1 hr) * (8760 hr/1 yr) * (1/1000000)

VOC Emissions (ton/yr) = Maximum Coverage (lb/MMin²) * Weight percent Volatiles * Flash off * Throughput * (1 ton/2000 lb)

NOTE: Heat set offset printing has an assumed flash off of 80%. Other type of printers have a flash off of 100%

Flexograph #7 consists of 650-1, 650-2, 650-3, 650-4, 650-5, 650-6, 650-7, 650-8, 650-9, 650-10, 650-11, 650-12, 650-13, 650-14, 650-15, 650-16, 650-17, 650-18, 650-19, 650-20, 650-21, 650-22, 650-23, 650-24, 650-25, 650-26, 650-27, 650-28, and 650-29

Appendix A: Emission Calculations
VOC from Printing Press Operations
SW-1, SW-2, SW-3, SW-4, SW-5
Company Name: Print Xcel dba Discount Labels
Address City IN Zi 4115 Profit Court, New Albany, IN 47150
Plant ID: 043-00029
Permit Number: F043-14011-00029
Reviewer: ERG/KC
Date: 06/19/01

Press ID	Maximum Line Speed (Feet)	Maximum Print Width (inches)	Throughput (MMin ² /year)
Flexograph #8	75	5.5	2601.72

Ink Name Press ID	Maximum Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	VOC Emissions (ton/yr)
Inks				
VS846 SonaPrint Pant Reflex Blue	0.6800	26.00%	100.00%	0.23
Additives				
Print Clean - Print Additive	0.0038	100.00%	100.00%	0.00
L/V Externder Varnish	0.0312	7.42%	100.00%	0.00
Aqua Discount Refresh	0.0172	13.33%	100.00%	0.00
Propylene Glycol	0.0019	100.00%	100.00%	0.00
L-1196	0.0175	22.56%	100.00%	0.01
Remaining Additives	0.0159	9.50%	100.00%	0.00
Cleaning Solvents				
Graphex Chrome Roller Cleaner	0.0002	10.00%	100.00%	0.00
A-60 Press Cleaner	0.0199	96.81%	100.00%	0.03
Clear Cell Anilox	0.0089	13.00%	100.00%	0.00
Adhesive Remover	0.0145	95.60%	100.00%	0.02
152	0.0874	12.90%	100.00%	0.01
Isopropyl Alcohol	0.0608	100.00%	100.00%	0.08
Plate Wash	0.9445	100.00%	100.00%	1.23

Total VOC Emissions (ton/yr) for 1 unit: 1.62
Total VOC Emissions (ton/yr) for 5 units: 8.09

Methodology

Throughput (MMin²/yr) = Maximum line speed (ft/min) * (12 in/1 ft) * Maximum print width (in) * (60 min/1 hr) * (8760 hr/1 yr) * (1/1000000)
VOC Emissions (ton/yr) = Maximum Coverage (lb/MMin²) * Weight percent Volatiles * Flash off * Throughput * (1 ton/2000 lb)

NOTE: Heat set offset printing has an assumed flash off of 80%. Other type of printers have a flash off of 100%
Flexograph #8 consists of SW-1, SW-2, SW-3, SW-4, and SW-5

**Appendix A: Emission Calculations
VOC from Printing Press Operations
BB-1**

**Company Name: Print Xcel dba Discount Labels
Address City IN Zip: 4115 Profit Court, New Albany, IN 47150
Plant ID: 043-00029
Permit Number: F043-14011-00029
Reviewer: ERG/KC
Date: 06/19/01**

Press ID	Maximum Line Speed (Feet)	Maximum Print Width (inches)	Throughput (MMin ² /year)
Flexograph #9	150	5	4730.4

Ink Name Press ID	Maximum Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	VOC Emissions (ton/yr)
Inks				
VS846 SonaPrint Pant Reflex Blue	0.6800	26.00%	100.00%	0.42
Additives				
Print Clean - Print Additive	0.0038	100.00%	100.00%	0.01
L/V Externder Varnish	0.0312	7.42%	100.00%	0.01
Aqua Discount Refresh	0.0172	13.33%	100.00%	0.01
Propylene Glycol	0.0019	100.00%	100.00%	0.00
L-1196	0.0175	22.56%	100.00%	0.01
Remaining Additives	0.0159	9.50%	100.00%	0.00
Cleaning Solvents				
Graphex Chrome Roller Cleaner	0.0002	10.00%	100.00%	0.00
A-60 Press Cleaner	0.0199	96.81%	100.00%	0.05
Clear Cell Anilox	0.0089	13.00%	100.00%	0.00
Adhesive Remover	0.0145	95.60%	100.00%	0.03
152	0.0874	12.90%	100.00%	0.03
Isopropyl Alcohol	0.0608	100.00%	100.00%	0.14
Plate Wash	0.9445	100.00%	100.00%	2.23

Total VOC Emissions (ton/yr) for 1 unit: 2.94

Methodology

Throughput (MMin²/yr) = Maximum line speed (ft/min) * (12 in/1 ft) * Maximum print width (in) * (60 min/1 hr) * (8760 hr/1 yr) * (1/1000000)

VOC Emissions (ton/yr) = Maximum Coverage (lb/MMin²) * Weight percent Volatiles * Flash off * Throughput * (1 ton/2000 lb)

NOTE: Heat set offset printing has an assumed flash off of 80%. Other type of printers have a flash off of 100%

Flexograph #9 consists of BB-1

**Appendix A: Emission Calculations
VOC from Printing Press Operations**

MAN-2, MAN-3

**Company Name: Print Xcel dba Discount Labels
Address City IN Zip: 4115 Profit Court, New Albany, IN 47150
Plant ID: 043-00029
Permit Number: F043-14011-00029
Reviewer: ERG/KC
Date: 06/19/01**

Press ID	Maximum Line Speed (Feet)	Maximum Print Width (inches)	Throughput (MMin ² /year)
Flexograph #10	150	12	11352.96

Ink Name Press ID	Maximum Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	VOC Emissions (ton/yr)
Inks				
VS846 SonaPrint Pant Reflex Blue	0.6800	26.00%	100.00%	1.00
Additives				
Print Clean - Print Additive	0.0038	100.00%	100.00%	0.02
L/V Externder Varnish	0.0312	7.42%	100.00%	0.01
Aqua Discount Refresh	0.0172	13.33%	100.00%	0.01
Propylene Glycol	0.0019	100.00%	100.00%	0.01
L-1196	0.0175	22.56%	100.00%	0.02
Remaining Additives	0.0159	9.50%	100.00%	0.01
Cleaning Solvents				
Graphex Chrome Roller Cleaner	0.0002	10.00%	100.00%	0.00
A-60 Press Cleaner	0.0199	96.81%	100.00%	0.11
Clear Cell Anilox	0.0089	13.00%	100.00%	0.01
Adhesive Remover	0.0145	95.60%	100.00%	0.08
152	0.0874	12.90%	100.00%	0.06
Isopropyl Alcohol	0.0608	100.00%	100.00%	0.34
Plate Wash	0.9445	100.00%	100.00%	5.36

**Total VOC Emissions (ton/yr) for 1 unit: 7.06
Total VOC Emissions (ton/yr) for 2 units: 14.12**

Methodology

Throughput (MMin²/yr) = Maximum line speed (ft/min) * (12 in/1 ft) * Maximum print width (in) * (60 min/1 hr) * (8760 hr/1 yr) * (1/1000000)
VOC Emissions (ton/yr) = Maximum Coverage (lb/MMin²) * Weight percent Volatiles * Flash off * Throughput * (1 ton/2000 lb)

NOTE: Heat set offset printing has an assumed flash off of 80%. Other type of printers have a flash off of 100%
Flexograph #10 consists of MAN-1 and MAN-3

**Appendix A: Emission Calculations
VOC from Printing Press Operations
MAN-4**

**Company Name: Print Xcel dba Discount Labels
Address City IN Zip: 4115 Profit Court, New Albany, IN 47150
Plant ID: 043-00029
Permit Number: F043-14011-00029
Reviewer: ERG/KC
Date: 06/19/01**

Press ID	Maximum Line Speed (Feet)	Maximum Print Width (inches)	Throughput (MMin²/year)
Flexograph #11	150	13	12299.04

Ink Name Press ID	Maximum Coverage (lbs/MMin²)	Weight % Volatiles	Flash Off %	VOC Emissions (ton/yr)
Inks				
VS846 SonaPrint Pant Reflex Blue	0.6800	26.00%	100.00%	1.09
Additives				
Print Clean - Print Additive	0.0038	100.00%	100.00%	0.02
L/V Externder Varnish	0.0312	7.42%	100.00%	0.01
Aqua Discount Refresh	0.0172	13.33%	100.00%	0.01
Propylene Glycol	0.0019	100.00%	100.00%	0.01
L-1196	0.0175	22.56%	100.00%	0.02
Remaining Additives	0.0159	9.50%	100.00%	0.01
Cleaning Solvents				
Graphex Chrome Roller Cleaner	0.0002	10.00%	100.00%	0.00
A-60 Press Cleaner	0.0199	96.81%	100.00%	0.12
Clear Cell Anilox	0.0089	13.00%	100.00%	0.01
Adhesive Remover	0.0145	95.60%	100.00%	0.09
152	0.0874	12.90%	100.00%	0.07
Isopropyl Alcohol	0.0608	100.00%	100.00%	0.37
Plate Wash	0.9445	100.00%	100.00%	5.81

Total VOC Emissions (ton/yr) for 1 unit: 7.65

Methodology

Throughput (MMin²/yr) = Maximum line speed (ft/min) * (12 in/1 ft) * Maximum print width (in) * (60 min/1 hr) * (8760 hr/1 yr) * (1/1000000)

VOC Emissions (ton/yr) = Maximum Coverage (lb/MMin²) * Weight percent Volatiles * Flash off * Throughput * (1 ton/2000 lb)

NOTE: Heat set offset printing has an assumed flash off of 80%. Other type of printers have a flash off of 100%

Flexograph #11 consists of MAN-4

Appendix A: Emission Calculations**VOC from Printing Press Operations****Ryobi-1, Ryobi-2, Ryobi-3, Ryobi-4, Ryobi-5, Ryobi-6, Ryobi-7, Ryobi-8, Ryobi-9, Ryobi-10****Company Name: Print Xcel dba Discount Labels****Address City IN Zip 4115 Profit Court, New Albany, IN 47150****Plant ID: 043-00029****Permit Number: F043-14011-00029****Reviewer: ERG/KC****Date: 06/19/01**

Press ID	Maximum Line Speed (sheet/min)	Maximum Print Area (in^2)	Throughput (MMin^2/year)
Flexograph #12	110	93.5	5405.796

Ink Name Press ID	Maximum Coverage (lbs/MMin^2)	Weight % Volatiles	Flash Off %	VOC Emissions (ton/yr)
Inks				
VS846 SonaPrint Pant Reflex Blue	0.68	26.00%	100.00%	0.48

Total VOC Emissions (ton/yr) for 1 unit: 0.48**Total VOC Emissions (ton/yr) for 10 units: 4.78****Methodology**

Throughput (MMin^2/yr) = Maximum line speed (sheet/min) * Maximum print area (in^2) * (60 min/1 hr) * (8760 hr/1 yr) * (1/1000000)

VOC Emissions (ton/yr) = Maximum Coverage (lb/MMin^2) * Weight percent Volatiles * Flash off * Throughput * (1 ton/2000 lb)

NOTE: Heat set offset printing has an assumed flash off of 80%. Other type of printers have a flash off of 100%

Flexograph #12 consists of Ryobi-1, Ryobi-2, Ryobi-3, Ryobi-4, Ryobi-5, Ryobi-6, Ryobi-7, Ryobi-8, Ryobi-9, and Ryobi-10

**Appendix A: Emission Calculations
VOC from Printing Press Operations**

Paint Booth

**Company Name: Print Xcel dba Discount Labels
Address City IN Zip: 4115 Profit Court, New Albany, IN 47150
Plant ID: 043-00029
Permit Number: F043-14011-00029
Reviewer: ERG/KC
Date: 06/19/01**

Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatile (solids)	Gal of Material (gal/unit)	Maximum (unit/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC/gal solids	Transfer Efficiency
Nitrocellulose Lacquer	7.05	81.70%	0.00%	81.70%	0.00%	13.20%	0.20	0.14	5.76	5.76	0.16	3.87	0.71	0.08	43.64	50.00%
Moisture Resistant Lacquer	7.4	75.50%	0.00%	75.50%	0.00%	84.50%	0.15	0.14	5.59	5.59	0.12	2.82	0.51	0.08	6.61	50.00%
K120 Lacquer	6.58	100.00%	18.00%	82.00%	0.00%	0.00%	0.20	0.14	5.40	5.40	0.15	3.63	0.66	0.00	ERR	50.00%

Total: 0.43 10.31 1.88 0.16

Methodology

Pounds of VOC per Gallon Coating less Water = Density (lb/gal) * Weight % Organics / (1-Volume % Water)

Pounds of VOC per Gallon Coating = Density (lb/gal) * Weight % Organics

Potential VOC Pounds Per Hour = Pounds of VOC per Gallon Coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds Per Day = Pounds of VOC per Gallon Coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) *24hour/day

Potential VOC Pounds Per Year = Pounds of VOC per Gallon Coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) *8760hr/yr * ton/2000lb

Particulate Potential Tons per year = (unit/hr) * (gal/unit) * (lb/gal) * (1- Weight % Volatiles) * (1- Transfer Efficiency) * 8760hr/yr * (1 tn/2000 lb)

Pounds VOC per Gallon Solids = Density (lb/gal) * Weight % Organics / Volume % Solids

**Appendix A: Emission Calculations
HAPs from Printing Press Operations
Paint Booth**

**Company Name: Print Xcel dba Discount Labels
Address City IN Zip: 4115 Profit Court, New Albany, IN 47150
Plant ID: 043-00029
Permit Number: F043-14011-00029
Reviewer: ERG/KC
Date: 06/19/01**

Material	Density (lb/gal)	Gal of Material (gal/unit)	Maximum (unit/hr)	Weight % Toluene	Weight % xylene	Weight % MEK	Weight % Methanol	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	MEK Emissions (ton/yr)	Methanol Emissions (ton/yr)
Nitrocellulose Lacquer	7.05	0.20	0.14	11.00%	4.00%	8.00%	4.00%	0.10	0.03	0.07	0.03
Moisture Resistant Lacquer	7.4	0.15	0.14	3.00%	4.00%	3.00%	0.00%	0.02	0.03	0.02	0.00
K120 Lacquer	6.58	0.20	0.14	13.00%	5.00%	0.00%	4.00%	0.10	0.04	0.00	0.03

Total: 0.22 0.10 0.09 0.07

Methodology

HAPs emission rate (ton/yr) = Density (lb/gal) * Gal of material (gal/unit) * maximum (unit/hr) * Weight % HAP * 8760hr/yr * 1 ton/2000 lb

**Appendix A: Emission Calculations
VOC from Printing Press Operations
WSW-1**

**Company Name: Print Xcel dba Discount Labels
Address City IN Zip: 4115 Profit Court, New Albany, IN 47150
Plant ID: 043-00029
Permit Number: F043-14011-00029
Reviewer: ERG/KC
Date: 06/19/01**

Press ID	Maximum Line Speed (sheet/min)	Maximum Print Width (inches)	Throughput (MMin ² /year)
Flexograph #13	75	12	5676.48

Ink Name Press ID	Maximum Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	VOC Emissions (ton/yr)
Inks				
VS846 SonaPrint Pant Reflex Blue	0.6800	26.00%	100.00%	0.50
Additives				
Print Clean - Print Additive	0.0038	100.00%	100.00%	0.01
L/V Externder Varnish	0.0312	7.42%	100.00%	0.01
Aqua Discount Refresh	0.0172	13.33%	100.00%	0.01
Propylene Glycol	0.0019	100.00%	100.00%	0.01
L-1196	0.0175	22.56%	100.00%	0.01
Remaining Additives	0.0159	9.50%	100.00%	0.00
Cleaning Solvents				
Graphex Chrome Roller Cleaner	0.0002	10.00%	100.00%	0.00
A-60 Press Cleaner	0.0199	96.81%	100.00%	0.05
Clear Cell Anilox	0.0089	13.00%	100.00%	0.00
Adhesive Remover	0.0145	95.60%	100.00%	0.04
152	0.0874	12.90%	100.00%	0.03
Isopropyl Alcohol	0.0608	100.00%	100.00%	0.17
Plate Wash	0.9445	100.00%	100.00%	2.68

Total VOC Emissions (ton/yr) for 1 unit: 3.53

Methodology

Throughput (MMin²/yr) = Maximum line speed (ft/min) * (12 in/1 ft) * Maximum print width (in) * (60 min/1 hr) * (8760 hr/1 yr) * (1/1000000)

VOC Emissions (ton/yr) = Maximum Coverage (lb/MMin²) * Weight percent Volatiles * Flash off * Throughput * (1 ton/2000 lb)

NOTE: Heat set offset printing has an assumed flash off of 80%. Other type of printers have a flash off of 100%

Flexograph #13 consists of WSW-1

**Appendix A: Emission Calculations
VOC from Printing Press Operations
MAN-5**

**Company Name: Print Xcel dba Discount Labels
Address City IN Zip: 4115 Profit Court, New Albany, IN 47150
Plant ID: 043-00029
Permit Number: F043-14011-00029
Reviewer: ERG/KC
Date: 06/19/01**

Press ID	Maximum Line Speed (sheet/min)	Maximum Print Width (inches)	Throughput (MMin ² /year)
Flexograph #14	200	12	15137.28

Ink Name Press ID	Maximum Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	VOC Emissions (ton/yr)
Inks				
VS846 SonaPrint Pant Reflex Blue	0.6800	26.00%	100.00%	1.34
Additives				
Print Clean - Print Additive	0.0038	100.00%	100.00%	0.03
L/V Externder Varnish	0.0312	7.42%	100.00%	0.02
Aqua Discount Refresh	0.0172	13.33%	100.00%	0.02
Propylene Glycol	0.0019	100.00%	100.00%	0.01
L-1196	0.0175	22.56%	100.00%	0.03
Remaining Additives	0.0159	9.50%	100.00%	0.01
Cleaning Solvents				
Graphex Chrome Roller Cleaner	0.0002	10.00%	100.00%	0.00
A-60 Press Cleaner	0.0199	96.81%	100.00%	0.15
Clear Cell Anilox	0.0089	13.00%	100.00%	0.01
Adhesive Remover	0.0145	95.60%	100.00%	0.10
152	0.0874	12.90%	100.00%	0.09
Isopropyl Alcohol	0.0608	100.00%	100.00%	0.46
Plate Wash	0.9445	100.00%	100.00%	7.15

Total VOC Emissions (ton/yr) for 1 unit: 9.41

Methodology

Throughput (MMin²/yr) = Maximum line speed (ft/min) * (12 in/1 ft) * Maximum print width (in) * (60 min/1 hr) * (8760 hr/1 yr) * (1/1000000)

VOC Emissions (ton/yr) = Maximum Coverage (lb/MMin²) * Weight percent Volatiles * Flash off * Throughput * (1 ton/2000 lb)

NOTE: Heat set offset printing has an assumed flash off of 80%. Other type of printers have a flash off of 100%
Flexograph #14 consists of MAN-5

**Appendix A: Emission Calculations
VOC from Printing Press Operations**

MAN-6

Company Name: Print Xcel dba Discount Labels

Address City IN Zip: 4115 Profit Court, New Albany, IN 47150

Plant ID: 043-00029

Permit Number: F043-14011-00029

Reviewer: ERG/KC

Date: 06/19/01

Press ID	Maximum Line Speed (sheet/min)	Maximum Print Width (inches)	Throughput (MMin ² /year)
Flexograph #15	400	16	40366.08

Ink Name Press ID	Maximum Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	VOC Emissions (ton/yr)
Inks				
VS846 SonaPrint Pant Reflex Blue	0.6800	26.00%	100.00%	3.57
Additives				
Print Clean - Print Additive	0.0038	100.00%	100.00%	0.08
L/V Externder Varnish	0.0312	7.42%	100.00%	0.05
Aqua Discount Refresh	0.0172	13.33%	100.00%	0.05
Propylene Glycol	0.0019	100.00%	100.00%	0.04
L-1196	0.0175	22.56%	100.00%	0.08
Remaining Additives	0.0159	9.50%	100.00%	0.03
Cleaning Solvents				
Graphex Chrome Roller Cleaner	0.0002	10.00%	100.00%	0.00
A-60 Press Cleaner	0.0199	96.81%	100.00%	0.39
Clear Cell Anilox	0.0089	13.00%	100.00%	0.02
Adhesive Remover	0.0145	95.60%	100.00%	0.28
152	0.0874	12.90%	100.00%	0.23
Isopropyl Alcohol	0.0608	100.00%	100.00%	1.23
Plate Wash	0.9445	100.00%	100.00%	19.06

Total VOC Emissions (ton/yr) for 1 unit: 25.09

Methodology

Throughput (MMin²/yr) = Maximum line speed (ft/min) * (12 in/1 ft) * Maximum print width (in) * (60 min/1 hr) * (8760 hr/1 yr) * (1/1000000)

VOC Emissions (ton/yr) = Maximum Coverage (lb/MMin²) * Weight percent Volatiles * Flash off * Throughput * (1 ton/2000 lb)

NOTE: Heat set offset printing has an assumed flash off of 80%. Other type of printers have a flash off of 100%

Flexograph #15 consists of MAN-6

**Appendix A: Emission Calculations
VOC from Printing Press Operations
MAN-7**

**Company Name: Print Xcel dba Discount Labels
Address City IN Zip 4115 Profit Court, New Albany, IN 47150
Plant ID: 043-00029
Permit Number: F043-14011-00029
Reviewer: ERG/KC
Date: 06/19/01**

Press ID	Maximum Line Speed (sheet/min)	Maximum Print Width (inches)	Throughput (MMin ² /year)
Flexograph #16	400	22	55503.36

Ink Name Press ID	Maximum Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	VOC Emissions (ton/yr)
Inks				
VS846 SonaPrint Pant Reflex Blue	0.6800	26.00%	100.00%	4.91
Additives				
Print Clean - Print Additive	0.0038	100.00%	100.00%	0.10
L/V Externder Varnish	0.0312	7.42%	100.00%	0.06
Aqua Discount Refresh	0.0172	13.33%	100.00%	0.06
Propylene Glycol	0.0019	100.00%	100.00%	0.05
L-1196	0.0175	22.56%	100.00%	0.11
Remaining Additives	0.0159	9.50%	100.00%	0.04
Cleaning Solvents				
Graphex Chrome Roller Cleaner	0.0002	10.00%	100.00%	0.00
A-60 Press Cleaner	0.0199	96.81%	100.00%	0.53
Clear Cell Anilox	0.0089	13.00%	100.00%	0.03
Adhesive Remover	0.0145	95.60%	100.00%	0.38
152	0.0874	12.90%	100.00%	0.31
Isopropyl Alcohol	0.0608	100.00%	100.00%	1.69
Plate Wash	0.9445	100.00%	100.00%	26.21

Total VOC Emissions (ton/yr) for 1 unit: 34.50

Methodology

Throughput (MMin²/yr) = Maximum line speed (ft/min) * (12 in/1 ft) * Maximum print width (in) * (60 min/1 hr) * (8760 hr/1 yr) * (1/1000000)

VOC Emissions (ton/yr) = Maximum Coverage (lb/MMin²) * Weight percent Volatiles * Flash off * Throughput * (1 ton/2000 lb)

NOTE: Heat set offset printing has an assumed flash off of 80%. Other type of printers have a flash off of 100%

Flexograph #16 consists of MAN-7

**Appendix A: Emission Calculations
VOC from Printing Press Operations
MAN-8**

**Company Name: Print Xcel dba Discount Labels
Address City IN Zip: 4115 Profit Court, New Albany, IN 47150
Plant ID: 043-00029
Permit Number: F043-14011-00029
Reviewer: ERG/KC
Date: 06/16/01**

Press ID	Maximum Line Speed (sheet/min)	Maximum Print Width (inches)	Throughput (MMin^2/year)
Flexograph #17	150	6.5	6149.52

Ink Name Press ID	Maximum Coverage (lbs/MMin^2)	Weight % Volatiles	Flash Off %	VOC Emissions (ton/yr)
Inks				
VS846 SonaPrint Pant Reflex Blue	0.6800	26.00%	100.00%	0.54
Additives				
Print Clean - Print Additive	0.0038	100.00%	100.00%	0.01
L/V Externder Varnish	0.0312	7.42%	100.00%	0.01
Aqua Discount Refresh	0.0172	13.33%	100.00%	0.01
Propylene Glycol	0.0019	100.00%	100.00%	0.01
L-1196	0.0175	22.56%	100.00%	0.01
Remaining Additives	0.0159	9.50%	100.00%	0.00
Cleaning Solvents				
Graphex Chrome Roller Cleaner	0.0002	10.00%	100.00%	0.00
A-60 Press Cleaner	0.0199	96.81%	100.00%	0.06
Clear Cell Anilox	0.0089	13.00%	100.00%	0.00
Adhesive Remover	0.0145	95.60%	100.00%	0.04
152	0.0874	12.90%	100.00%	0.03
Isopropyl Alcohol	0.0608	100.00%	100.00%	0.19
Plate Wash	0.9445	100.00%	100.00%	2.90

Total VOC Emissions (ton/yr) for 1 unit: 3.82

Methodology

Throughput (MMin^2/yr) = Maximum line speed (ft/min) * (12 in/1 ft) * Maximum print width (in) * (60 min/1 hr) * (8760 hr/1 yr) * (1/1000000)

VOC Emissions (ton/yr) = Maximum Coverage (lb/MMin^2) * Weight percent Volatiles * Flash off * Throughput * (1 ton/2000 lb)

NOTE: Heat set offset printing has an assumed flash off of 80%. Other type of printers have a flash off of 100%
Flexograph #17 consists of MAN-8

Appendix A: Emission Calculations
HAPs from Printing Press Operations
Company Name: Print Xcel dba Discount Labels
Address City IN Zip: 4115 Profit Court, New Albany, IN 47150
Plant ID: 043-00029
Permit Number: F043-14011-00029
Reviewer: ERG/KC
Date: 06/19/01

Worst Cast Ink

Press ID	Number of Presses	Maximum Coverage (lbs/MMin^2)	Weight % Ethylene Glycol	Flash Off %	Throughput (MMin^2/yr)	Ethylene Glycol Emissions (ton/yr)
Flexograph #1	6	0.68	0.35%	100.00%	4730.4	0.03
Flexograph #2	16	0.68	0.35%	100.00%	2838.24	0.05
Flexograph #3	4	0.68	0.35%	100.00%	3784.32	0.02
Flexograph #4	5	0.68	0.35%	100.00%	3784.32	0.02
Flexograph #5	5	0.68	0.35%	100.00%	2365.2	0.01
Flexograph #6	18	0.68	0.35%	100.00%	3784.32	0.08
Flexograph #7	29	0.68	0.35%	100.00%	5676.48	0.20
Flexograph #8	5	0.68	0.35%	100.00%	2601.72	0.02
Flexograph #9	1	0.68	0.35%	100.00%	4730.4	0.01
Flexograph #10	2	0.68	0.35%	100.00%	11352.96	0.03
Flexograph #11	1	0.68	0.35%	100.00%	12299.04	0.01
Flexograph #13	1	0.68	0.35%	100.00%	5676.48	0.01
Flexograph #14	1	0.68	0.35%	100.00%	15137.28	0.02
Flexograph #15	1	0.68	0.35%	100.00%	40366.08	0.05
Flexograph #16	1	0.68	0.35%	100.00%	55503.36	0.07
Flexograph #17	1	0.68	0.35%	100.00%	6149.52	0.01

Total: 0.63

Worst Case Additive: L/V Extender Varnish

Press ID	Number of Presses	Maximum Coverage (lbs/MMin^2)	Weight % Ethylene Glycol	Flash Off %	Throughput (MMin^2/yr)	Ethylene Glycol Emissions (ton/yr)
Flexograph #1	6	0.09	0.23%	100.00%	4730.4	0.00
Flexograph #2	16	0.09	0.23%	100.00%	2838.24	0.00
Flexograph #3	4	0.09	0.23%	100.00%	3784.32	0.00
Flexograph #4	5	0.09	0.23%	100.00%	3784.32	0.00
Flexograph #5	5	0.09	0.23%	100.00%	2365.2	0.00
Flexograph #6	18	0.09	0.23%	100.00%	3784.32	0.01
Flexograph #7	29	0.09	0.23%	100.00%	5676.48	0.02
Flexograph #8	5	0.09	0.23%	100.00%	2601.72	0.00
Flexograph #9	1	0.09	0.23%	100.00%	4730.4	0.00
Flexograph #10	2	0.09	0.23%	100.00%	11352.96	0.00
Flexograph #11	1	0.09	0.23%	100.00%	12299.04	0.00
Flexograph #13	1	0.09	0.23%	100.00%	5676.48	0.00
Flexograph #14	1	0.09	0.23%	100.00%	15137.28	0.00
Flexograph #15	1	0.09	0.23%	100.00%	40366.08	0.00
Flexograph #16	1	0.09	0.23%	100.00%	55503.36	0.01
Flexograph #17	1	0.09	0.23%	100.00%	6149.52	0.00

Total: 0.05

Cleaner HAP emissions

Graphex Chrome Roller Cleaner

Press ID	Number of Presses	Maximum Coverage (lbs/MMin ²)	Weight % Glycol Ether	Flash Off %	Throughput (MMin ² /yr)	Gycol Ether Emissions (ton/yr)
Flexograph #1	6	0.0002	5.00%	100.00%	4730.4	0.00
Flexograph #2	16	0.0002	5.00%	100.00%	2838.24	0.00
Flexograph #3	4	0.0002	5.00%	100.00%	3784.32	0.00
Flexograph #4	5	0.0002	5.00%	100.00%	3784.32	0.00
Flexograph #5	5	0.0002	5.00%	100.00%	2365.2	0.00
Flexograph #6	18	0.0002	5.00%	100.00%	3784.32	0.00
Flexograph #7	29	0.0002	5.00%	100.00%	5676.48	0.00
Flexograph #8	5	0.0002	5.00%	100.00%	2601.72	0.00
Flexograph #9	1	0.0002	5.00%	100.00%	4730.4	0.00
Flexograph #10	2	0.0002	5.00%	100.00%	11352.96	0.00
Flexograph #11	1	0.0002	5.00%	100.00%	12299.04	0.00
Flexograph #13	1	0.0002	5.00%	100.00%	5676.48	0.00
Flexograph #14	1	0.0002	5.00%	100.00%	15137.28	0.00
Flexograph #15	1	0.0002	5.00%	100.00%	40366.08	0.00
Flexograph #16	1	0.0002	5.00%	100.00%	55503.36	0.00
Flexograph #17	1	0.0002	5.00%	100.00%	6149.52	0.00

Total: 0.00

A-60 Odorless Press Cleaner

Press ID	Number of Presses	Maximum Coverage (lbs/MMin ²)	Weight % Xylene	Weight % 1,2,4 Trimethylbenzene	Weight % Cumene	Flash Off %	Throughput (MMin ² /yr)	Xylene Emissions (ton/yr)	1,2,4 Trimethylbenzene Emissions (ton/yr)	Cumene Emissions (ton/yr)
Flexograph #1	6	0.0199	5.00%	10.87%	1.55%	100.00%	4730.4	0.01	0.03	0.00
Flexograph #2	16	0.0199	5.00%	10.87%	1.55%	100.00%	2838.24	0.02	0.05	0.01
Flexograph #3	4	0.0199	5.00%	10.87%	1.55%	100.00%	3784.32	0.01	0.02	0.00
Flexograph #4	5	0.0199	5.00%	10.87%	1.55%	100.00%	3784.32	0.01	0.02	0.00
Flexograph #5	5	0.0199	5.00%	10.87%	1.55%	100.00%	2365.2	0.01	0.01	0.00
Flexograph #6	18	0.0199	5.00%	10.87%	1.55%	100.00%	3784.32	0.03	0.07	0.01
Flexograph #7	29	0.0199	5.00%	10.87%	1.55%	100.00%	5676.48	0.08	0.18	0.03
Flexograph #8	5	0.0199	5.00%	10.87%	1.55%	100.00%	2601.72	0.01	0.01	0.00
Flexograph #9	1	0.0199	5.00%	10.87%	1.55%	100.00%	4730.4	0.00	0.01	0.00
Flexograph #10	2	0.0199	5.00%	10.87%	1.55%	100.00%	11352.96	0.01	0.02	0.00
Flexograph #11	1	0.0199	5.00%	10.87%	1.55%	100.00%	12299.04	0.01	0.01	0.00
Flexograph #13	1	0.0199	5.00%	10.87%	1.55%	100.00%	5676.48	0.00	0.01	0.00
Flexograph #14	1	0.0199	5.00%	10.87%	1.55%	100.00%	15137.28	0.01	0.02	0.00
Flexograph #15	1	0.0199	5.00%	10.87%	1.55%	100.00%	40366.08	0.02	0.04	0.01
Flexograph #16	1	0.0199	5.00%	10.87%	1.55%	100.00%	55503.36	0.03	0.06	0.01
Flexograph #17	1	0.0199	5.00%	10.87%	1.55%	100.00%	6149.52	0.00	0.01	0.00

Total: 0.26 0.57 0.08

Clear Cell Annilox

Press ID	Number of Presses	Maximum Coverage (lbs/MMin^2)	Weight % Glycol Ether	Flash Off %	Throughput (MMin^2/yr)	Gycol Ether Emissions (ton/yr)
Flexograph #1	6	0.0089	10.00%	100.00%	4730.4	0.01
Flexograph #2	16	0.0089	10.00%	100.00%	2838.24	0.02
Flexograph #3	4	0.0089	10.00%	100.00%	3784.32	0.01
Flexograph #4	5	0.0089	10.00%	100.00%	3784.32	0.01
Flexograph #5	5	0.0089	10.00%	100.00%	2365.2	0.01
Flexograph #6	18	0.0089	10.00%	100.00%	3784.32	0.03
Flexograph #7	29	0.0089	10.00%	100.00%	5676.48	0.07
Flexograph #8	5	0.0089	10.00%	100.00%	2601.72	0.01
Flexograph #9	1	0.0089	10.00%	100.00%	4730.4	0.00
Flexograph #10	2	0.0089	10.00%	100.00%	11352.96	0.01
Flexograph #11	1	0.0089	10.00%	100.00%	12299.04	0.01
Flexograph #13	1	0.0089	10.00%	100.00%	5676.48	0.00
Flexograph #14	1	0.0089	10.00%	100.00%	15137.28	0.01
Flexograph #15	1	0.0089	10.00%	100.00%	40366.08	0.02
Flexograph #16	1	0.0089	10.00%	100.00%	55503.36	0.02
Flexograph #17	1	0.0089	10.00%	100.00%	6149.52	0.00
Total:						0.23

Total VOC Emissions

Company Name: Print Xcel dba Discount Labels
Address City IN Zip: 4115 Profit Court, New Albany, IN 47150
Plant ID: 043-00029
Permit Number: F043-14011-00029
Reviewer: ERG/KC
Date: 06/19/01

VOC Emissions

Press	Emissions (ton/yr)
Flexograph #1	17.64
Flexograph #2	28.23
Flexograph #3	9.41
Flexograph #4	11.76
Flexograph #5	7.35
Flexograph #6	42.35
Flexograph #7	101.48
Flexograph #8	8.09
Flexograph #9	2.94
Flexograph #10	14.12
Flexograph #11	7.65
Flexograph #12	4.78
Paint Booth	1.88
Flexograph #13	3.53
Flexograph #14	9.41
Flexograph #15	25.09
Flexograph #16	34.5
Flexograph #17	3.82
Total	334.03
Total VOC Removed*	237
Total VOC PTE	97.03

*Based on data provided by the source. Represents the quantity of plate wash VOC shipped off-site for disposal.